

ORIGINAL


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6 STUDIOS LIMITED and ANDREW AINSWORTH

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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**
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11 LUCASFILM LTD., a California)	No. CV05-3434 RGK (MANx)
12 corporation,)	
13)	DECLARATION OF GEMMA
14 Plaintiff,)	CULLIS IN SUPPORT OF
15)	REPLY BY DEFENDANTS TO
16 v.)	PLAINTIFF'S OPPOSITION
17 SHEPPERTON DESIGN STUDIOS)	TO THEIR MOTION TO
18 LIMITED, a United Kingdom company)	DISMISS FOR LACK OF
19 incorporated in England, ANDREW)	JURISDICTION
20 AINSWORTH, an individual, and DOES)	(FRCP 12(b)(2))
21 1 through 10, both inclusive,)	
22)	Date of hearing: Sept. 19, 2005
23 Defendants.)	Time: 9:00 a.m.
)	Assigned to:
)	Judge R. Gary Klausner
)	Room 850

24 1. I, Gemma Cullis, do declare and state as follows:

25 2. I am a Solicitor at Reynolds Porter Chamberlain,  Manchester

26 House, 272-282 High Holborn, London, England. I have personal knowledge

27 of the facts stated in this declaration, and if called as a witness could

28 competently testify to them. I make this declaration in support of the Reply of

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20 2005

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Defendants to Plaintiff's Opposition to their Motion to Dismiss for Lack of Jurisdiction filed concurrently herewith and for no other purpose.

3. Despite Plaintiff's claims and its affidavit from Mr. Raymond Black, Lucasfilm has the option to sue Shepperton in England for alleged infringement since the manufacture, offer of sale and shipment from England of an allegedly infringing product could be deemed an infringement in England just as it would in the United States.

4. The Plaintiff already has Counsel in the United Kingdom, being Mark Owen of Harbottle and Lewis LLP, with whom Reynolds Porter Chamberlain have already been in correspondence.

I declare under penalty of perjury under the laws of England, the United States of America, and the State of California that the foregoing is true and correct.

Executed September 12th, 2005 at London, United Kingdom.



Gemma Cullis

1 **PROOF OF SERVICE**

2 I, the undersigned, certify that I am employed in the County of Orange, State
3 of California; that I am over the age of eighteen years and not a party to the within
4 action; and that my business address is 2040 Main Street, Suite 850, Irvine, CA
5 92614. On this date, I served the following document(s):

6 **DECLARATION OF GEMMA CULLIS IN SUPPORT OF**
7 **DEFENDANTS' REPLY TO PLAINTIFF'S OPPOSITION TO THEIR**
8 **MOTION TO DISMISS FOR LACK OF JURISDICTION**

9 on the parties stated below, through their attorneys of record, by placing true copies
10 thereof in sealed envelopes addressed as shown below by the following means of
11 service:

12 : By First-Class Mail — I am readily familiar with the firm's practice for
13 collection and processing of correspondence for mailing. Under that practice, the
14 correspondence is deposited with the United States Postal Service on the same day as
15 collected, with first-class postage thereon fully prepaid, in Irvine, California, for
16 mailing to the office of the addressee following ordinary business practices.

17 : By Personal Service — I caused each such envelope to be given to a courier
18 messenger to personally deliver to the office of the addressee.

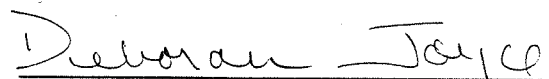
19 X: By Overnight Courier — I caused each such envelope to be given to an
20 overnight mail service at Irvine, California, to be hand delivered to the office of the
21 addressee on the next business day.

22 X: By Facsimile — by personally sending a true and correct copy of the above-
23 described document(s) to the party(ies) listed on the attached/below mailing list from
24 facsimile machine number (949) 475-6910 to the facsimile machine number(s)
25 indicated on the attached/below mailing list. I certify that said transmission was
26 completed and that all pages were received by the recipient(s) and that a report was
27 generated by facsimile machine number (949) 475-6910 which confirms said
28 transmission(s) and receipt(s).

29 Peter J. Anderson
30 LAW OFFICES OF PETER J.
31 ANDERSON
32 100 Wilshire Boulevard, Suite 2010
33 Santa Monica, CA 90401
34 Fax: (310) 260-6040

Attorney for Plaintiff

35 I declare that I am employed in the office of a member of this court at whose
36 direction the service was made. Executed on September 12, 2005, at Irvine,
37 California.

38 
39 _____
40 Deborah Joyce